

**BEFORE THE  
PUBLIC UTILITIES COMMISSION  
AND THE ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

08-30-07  
01:11 PM

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emission Standards into Procurement Policies.

Rulemaking 06-04-009  
(Filed April 13, 2006)

Order Instituting Informational Proceeding – AB 32.

CEC Docket No. 07-OIIP-01

**SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY  
REPLY COMMENT ON PROPOSED DECISION  
ON REPORTING AND TRACKING  
OF GREENHOUSE GAS EMISSIONS IN THE ELECTRICITY SECTOR**

Norman A. Pedersen, Esq.  
HANNA AND MORTON LLP  
444 South Flower Street, Suite 1500  
Los Angeles, California 90071-2916  
Telephone: (213) 430-2510  
Facsimile: (213) 623-3379  
E-mail: [npedersen@hanmor.com](mailto:npedersen@hanmor.com)

Attorney for the **SOUTHERN  
CALIFORNIA PUBLIC POWER  
AUTHORITY**

Dated: August 30, 2007

## **TABLE OF CONTENTS**

### **Page**

<b>I.</b>	<b>THE REPORTING PROTOCOL SHOULD BE REVISED TO REQUIRE REPORTING OF EMISSIONS ASSOCIATED WITH ELECTRICITY DELIVERED FROM A SPECIFIED SOURCE TO A RETAIL PROVIDER RATHER THAN ELECTRICITY ASSOCIATED WITH A RETAIL PROVIDER’S “OWNERSHIP SHARE” OF A SPECIFIED SOURCE. ....</b>	<b>2</b>
<b>II.</b>	<b>THE PROVISIONS IN SECTIONS 3.9 AND 3.11 FOR ADJUSTMENTS TO TOTAL EMISSIONS FOR SALES AND EXCHANGES TO COUNTERPARTIES WITHIN CALIFORNIA SHOULD BE GENERALLY APPLICABLE TO ALL COUNTER PARTIES, NOT JUST THOSE IN CALIFORNIA.....</b>	<b>3</b>
<b>III.</b>	<b>THE DEFAULT FACTORS FOR THE PACIFIC NORTHWEST (“PNW”) AND THE SOUTHWEST SHOULD BE SET ON THE BASIS OF MARGINAL PRODUCTION COST. ....</b>	<b>4</b>
<b>IV.</b>	<b>CONCLUSION .....</b>	<b>5</b>

In accordance with Rule 14 of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC”), the Southern California Public Power Authority (“SCPPA”) respectfully submits this reply to opening comments that were filed on August 24, 2007, in the captioned proceedings.

Upon review of the opening comments, SCPPA is concerned that there is a need for further refinement of the proposed electricity sector greenhouse gas reporting and tracking protocol (“Reporting Protocol”) that would be adopted by the PD. Particularly, sections 3.8 through 3.11 regarding the treatment of sales and exchanges are difficult to understand. As a result, as evidenced by the opening comments, they are subject to varying interpretations. Additionally, key terms are left undefined. The lack of essential definitions could result in misapplication of the reporting rules by retail providers.

Ultimately, the Reporting Protocol would be subject to adoption by the California Air Resources Board (“CARB”). Insofar as CARB is subject to the California Administrative Procedures Act (“APA”), any rules that are ultimately adopted by CARB will be subject to the APA requirement of “clarity.” The ultimately adopted regulations must be “written or displayed so that the meaning of regulations will be easily understood by those persons directly affected by them.” Cal. Gov. Code § 11349(c). SCPPA recommends that the CPUC and the California Energy Commission (“CEC”) (jointly, “Commissions”) take some time to refine the Reporting Protocol. Although that might delay the date by which the Commissions would propose Reporting Protocol to CARB, taking more time now could expedite CARB’s promulgation of a final reporting protocol that would, presumably, be tendered by CARB to the Office of Administrative Law (“OAL”) for review under the APA. *See* Cal. Gov. Code § 11349.1(a).

SCPPA now responds to other points made in the opening comments.

**I. THE REPORTING PROTOCOL SHOULD BE REVISED TO REQUIRE REPORTING OF EMISSIONS ASSOCIATED WITH ELECTRICITY DELIVERED FROM A SPECIFIED SOURCE TO A RETAIL PROVIDER RATHER THAN ELECTRICITY ASSOCIATED WITH A RETAIL PROVIDER’S “OWNERSHIP SHARE” OF A SPECIFIED SOURCE.**

Section 3.2 of the Reporting Protocol would attribute “emissions to the reporting entity based on its proportional ownership share (not the amount of electricity received”). Reporting Protocol at A-6. Likewise, section 3.8 would require that reporting entities must “report the portion of any sales made by the plant operator based on the reporting entity’s ownership share of the power plant.” Reporting Protocol at A-8.

Various parties object to this requirement that reports be based on “ownership share.” *See, e.g.,* Northern California Power Agency (“NCPA”) at 4. Those parties argue that “CARB should only attribute emissions for that portion of the energy that is *consumed* in California. *Ibid.* SCPPA concurs. Section AB 32 requires that CARB’s regulations shall “account for greenhouse gas emissions from all electricity *consumed* in the state....” Cal. Health and Safety Code § 38530(b)(2)(f). Thus, requiring retail providers to report on the basis of electricity actually received from a specified resource would be consistent with AB 32. The requirement that retail providers report on the basis of “ownership share” is inconsistent with AB 32, and it would be inconsistent with the protocols for reporting emissions associated with deliveries of electricity from other sources.

Furthermore, it would be administratively burdensome to require reporting on the basis of “ownership share” with deviations being reported as proposed in section 3.8 of the Reporting Protocol. Deviations from the “ownership share” occur daily due to a wide variety of events ranging from variations in plant output to transmission outages. It is unclear from the Reporting Protocol how often reporting entities would be required to submit the reports required by section 3.8, but there could potentially be hundreds of events to report if the reporting is to be done on an

annual basis. The administrative burden would unnecessarily increase the costs and complexity of the GHG regulatory program for the electric sector.

**II. THE PROVISIONS IN SECTIONS 3.9 AND 3.11 FOR ADJUSTMENTS TO TOTAL EMISSIONS FOR SALES AND EXCHANGES TO COUNTERPARTIES WITHIN CALIFORNIA SHOULD BE GENERALLY APPLICABLE TO ALL COUNTER PARTIES, NOT JUST THOSE IN CALIFORNIA.**

Section 3.7 of the Reporting Protocol provides: “ARB sums the total metric tons of emissions of owned power plants, purchases from specified sources, and purchases from unspecified sources as described in both sections. ARB then converts the GHG emissions to CO<sub>2</sub> emissions to CO<sub>2</sub> equivalents and calculates the total.” Reporting Protocol at A-7. Section 3.9 provides for adjustments to total emissions as calculated in section 3.7 to account for sales and exchanges from specified sources to counter parties within California. Section 3.11 provides for similar adjustments for sales and adjustments from unspecified sources to counter parties within California. In general, the adjustments that would be made under sections 3.9 and 3.11 to account for sales and exchanges would be a deductions from the totals described in section 3.7.

Parties object to limiting the adjustment for sales and exchanges to counter parties that are located within California. *See, e.g.,* Sacramento Municipal Utility District at 10. They argue that the adjustments of the totals described in section 3.7 should be made for sales to and exchanges with *all* counter parties, not just those within California. SCPPA agrees. The recommended modification of the Reporting Protocol would be consistent with the AB 32 requirement that CARB adopt regulations that shall “account for greenhouse gas emissions from all electricity consumed in the state....” Cal. Health and Safety Code §38530(b)(2).

### **III. THE DEFAULT FACTORS FOR THE PACIFIC NORTHWEST (“PNW”) AND THE SOUTHWEST SHOULD BE SET ON THE BASIS OF MARGINAL PRODUCTION COST.**

The Commissions’ joint staffs recommend in their June 12, 2007 Staff Proposal that the default factor for deliveries from the Southwest should be based upon a marginal production cost methodology. In its July 2, 2007 opening comment, SCPPA recommended that the same methodology be applied to develop the default factor for the PNW. In letters dated July 10, 2007, the states of Oregon and Washington essentially concurred with SCPPA’s recommendation.

In response, the PD adopts a default factor of 1,062 CO<sub>2</sub>/MWh for the Pacific Northwest states *excluding* deliveries from BC Hydro. The Commission regards BH Hydro as delivering 100 percent hydro electric energy. Upon including BC Hydro deliveries with PNW state deliveries, the Commission adopts an overall default factor of 714 lbs. CO<sub>2</sub>/MWh for the PNW. PD at 31.

The Division of Ratepayer Advocates (“DRA”) argues that an “averaging methodology” is more appropriate to setting reasonable default values than a production cost methodology. DRA Opening Comment at 4. The Natural Resources Defense Council (“NRDC”) appears to agree. NRDC Opening Comment at 6. Conversely, Calpine Corporation (“Calpine”) argues that regional default admission factors for unspecified resources should “reflect the highest emitting unit in a region.” Calpine Opening Comment at 4. The Independent Energy Producers (“IEP”) agrees. IEP Opening Comment at 3.

Both DRA/NRDC and CalPine/IEP err in making their recommendations. The purpose of the Reporting Protocol is to “account for greenhouse gas emissions from all electricity consumed in the state....” Cal. Health and Safety Code § 38530(b)(2). The clear implication is that the Legislation intends that there be an *accurate* accounting for “greenhouse gas emissions

from all electricity consumed in the state.” Although using the methodologies for determining regional default factors as proposed by DRA/NRDC and by Calpine/IEP would accomplish other policy objectives, they would fail to result in an *accurate* determination of the actual emissions associated with deliveries from unspecified resources for consumption in California. The proposals by DRA/NRDC and Calpine/IEP that the Commissions utilize other methodologies should not be adopted.

#### **IV. CONCLUSION**

For the reasons set forth above, SCPPA recommends that the Commissions improve the clarity of the Reporting Protocol. Further, for the reasons set forth in SCPPA’s opening comments and herein, SCPPA recommends that the Commissions:

- Remove the anti “contract shuffling” provisions from the Reporting Protocol.
- Revise section 3.2 so that emissions attributed to a reporting entity are determined on the basis of electricity received by the entity from a specified resource rather than on the basis of the reporting entity’s “proportional ownership share” in a power plant.
- Revise sections 3.9 and 3.10 regarding adjustments to total admissions for sales and exchanges so that the adjustments apply to sales to and exchanges with all counter parties, not just those located within California.

- Calculate default factors on the basis of marginal production cost methodology, with the Southwest factor being 1,075 lbs. CO<sub>2</sub>/MWh and the PNW factor being 1,062 lbs. CO<sub>2</sub>/MWh on an interim basis pending further results of modeling regarding the PNW factor.

Respectfully submitted,

*/s/ Norman A. Pedersen*

---

Norman A. Pedersen, Esq.  
HANNA AND MORTON LLP  
444 South Flower Street, Suite 1500  
Los Angeles, California 90071-2916  
Telephone: (213) 430-2510  
Facsimile: (213) 623-3379  
E-mail: *npedersen@hanmor.com*

Attorney for the **SOUTHERN CALIFORNIA  
PUBLIC POWER AUTHORITY**

Dated: August 30, 2007



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY REPLY COMMENT ON PROPOSED DECISION ON REPORTING AND TRACKING OF GREENHOUSE GAS EMISSIONS IN THE ELECTRICITY SECTOR** on the service list for CPUC Docket No. R.06-04-009 and CEC Docket No. 07-OIIP-01 by serving a copy to each party by electronic mail and/or by mailing a properly addressed copy by first-class mail with postage prepaid.

Executed on August 30, 2007, at Los Angeles, California.

*/s/ Sylvia Cantos*

\_\_\_\_\_  
Sylvia Cantos

**R.06-04-009 SERVICE LIST  
DOCKET 07-OHP-01 SERVICE LIST**

abb@eslawfirm.com  
abonds@thelen.com  
achang@nrdc.org  
adamb@greenlining.org  
aeg@cpuc.ca.gov  
agc@cpuc.ca.gov  
agrimaldi@mckennalong.com  
aimee.branes@ecosecurities.com  
ajkatz@mwe.com  
akbar.jazayeri@sce.com  
akelly@climatetrust.org  
alan.comnes@nrgenergy.com  
aldyn.hoekstra@paceglobal.com  
alho@pge.com  
amber@ethree.com  
amsmith@semptra.com  
andrew.bradford@constellation.com  
andrew.mcallister@energycenter.org  
andy.vanhorn@vhcenergy.com  
anginc@goldrush.com  
anita.hart@swgas.com  
annabelle.malins@fco.gov.uk  
annette.gilliam@sce.com  
apak@sempraglobal  
arno@recurrentenergy.com  
atrial@semptra.com  
atrowbridge@daycartermurphy.com  
Audra.Hartmann@Dynergy.com  
aweller@sel.com  
bbaker@summitblue.com  
bbeebe@smud.org  
bblevins@energy.state.ca.us  
bcragg@goodinmacbride.com  
bdicapo@caiso.com  
beth@beth411.com  
Betty.Seto@kema.com  
bill.chen@constellation.com  
bill.schrand@swgas.com  
bjeider@ci.burbank.ca.us  
bjl@bry.com  
bjones@mjbbradley.com  
bkc7@pge.com  
blm@cpuc.ca.gov  
bmcc@mccarthyllaw.com  
bmcquown@reliant.com  
Bob.lucas@calobby.com  
bpotts@foley.com

bpurewal@water.ca.gov  
brabe@umich.edu  
brbarkovich@earthlink.net  
brenda.lemay@horizonwind.com  
burtraw@rff.org  
bushinskyj@pewclimate.org  
C\_Marnay@1b1.gov  
cadams@covantaenergy.com  
californiadockets@pacificorp.com  
carla.peterman@gmail.com  
carter@ieta.org  
case.admin@sce.com  
cathy.karlstad@sce.com  
cbaskette@enernoc.com  
cbreidenich@yahoo.com  
cchen@ucsusa.org  
cem@newsdata.com  
cft@cpuc.ca.gov  
charlie.blair@delta-ee.com  
chilen@sppc.com  
chrism@mid.org  
cjw5@pge.com  
ckmitchell1@sbcglobal.net  
ckrupka@mwe.com  
clarence.binninger@doj.ca.gov  
clark.bernier@rlw.com  
clyde.murley@comcast.net  
cmkehrein@ems-ca.com  
colin.petheram@att.com  
cpe@cpuc.ca.gov  
cpechman@powereconomics.com  
cswooliums@midamerican.com  
curt.barry@iwpnews.com  
curtis.kebler@gs.com  
cynthia.schultz@pacificorp.com  
daking@semptra.com  
Dan.adler@calcef.org  
dansvec@hdo.net  
dave@ppallc.com  
david.zonana@doj.ca.gov  
david@branchcomb.com  
david@nemtzwow.com  
davidreynolds@ncpa.com  
dbrooks@nevpc.com  
deb@a-klaw.com  
deborah.slone@doj.ca.gov  
dehling@king.com

Denise\_Hill@transalta.com  
derek@climateregistry.org  
dhecht@sempratrading.com  
dhuard@manatt.com  
diane\_fellman@fpl.com  
dietrichlaw2@earthlink.net  
dil@cpuc.ca.gov  
dks@cpuc.ca.gov  
dmacml@water.ca.gov  
dmetz@energy.state.ca.us  
douglass@energyattorney.com  
dsh@cpuc.ca.gov  
dsoyars@sppc.com  
dtibbs@aes4u.com  
dwang@nrdc.org  
dwood8@cox.net  
dws@r-c-s-inc.com  
echiang@elementmarkets.com  
edm@cpuc.ca.gov  
egw@a-klaw.com  
ehadley@reupower.com  
ej\_wright@oxy.com  
ek@a-klaw.com  
ekgrubaugh@iid.com  
ELL5@pge.com  
elvine@lbl.gov  
emahlon@ecoact.org  
emello@sppc.com  
epoole@adplaw.com  
e-recipient@caiso.com  
etiedemann@kmtg.com  
ewolfe@resero.com  
ez@pointcarbon.com  
farrokh.albuyeh@oati.net  
fiji.george@el Paso.com  
filings@a-klaw.com  
fjs@cpuc.ca.gov  
fluchetti@ndep.nv.gov  
fwmonier@tid.org  
gbarch@knowledgeinenergy.com  
george.hopley@barcap.com  
ghinners@reliant.com  
GloriaB@anzaelectric.org  
glw@eslawfirm.com  
gmorris@emf.net  
gottstein@volcano.net  
gpickering@navigantconsulting.com  
greg.blue@sbcglobal.net  
gregory.koiser@constellation.com  
grosenblum@caiso.com

gsmith@adamsbroadwell.com  
gx12@pge.com  
harveyederpspc.org@hotmail.com  
hayley@turn.org  
hcronin@water.ca.gov  
hgolub@nixonpeabody.com  
hoerner@redefiningprogress.org  
hs1@cpuc.ca.gov  
hurlock@water.ca.gov  
hyao@semprautilities.com  
hym@cpuc.ca.gov  
info@calseia.org  
jack.burke@energycenter.org  
james.keating@bp.com  
janill.richards@doj.ca.gov  
jarmstrong@goodinmacbride.com  
jason.dubchak@niskags.com  
jbf@cpuc.ca.gov  
jbw@slwplc.com  
jchamberlin@strategicenergy.com  
jci@cpuc.ca.gov  
JDF1@PGE.COM  
jdh@eslawfirm.com  
jeanne.sole@sfgov.org  
jeffgray@dwt.com  
jen@cnt.org  
jenine.schenk@apses.com  
jennifer.porter@energycenter.org  
JerryL@abag.ca.gov  
jesus.arredondo@nrgenergy.com  
jf2@cpuc.ca.gov  
jgill@caiso.com  
jhahn@covantaenergy.com  
jimross@r-c-s-inc.com  
jj.prucnal@swgas.com  
jjensen@kirkwood.com  
jk1@cpuc.ca.gov  
jkarp@winston.com  
jkloberdanz@semprautilities.com  
jlaun@apogee.net  
jleslie@luce.com  
jluckhardt@downeybrand.com  
jm3@cpuc.ca.gov  
jnm@cpuc.ca.gov  
jody\_london\_consulting@earthlink.net  
Joe.paul@dynegy.com  
john.hughes@sce.com  
johnredding@earthlink.net  
jol@cpuc.ca.gov  
josephhenri@hotmail.com

joyw@mid.org  
jsanders@caiso.com  
jscancarelli@flk.com  
jsqueri@gmssr.com  
jst@cpuc.ca.gov  
jtp@cpuc.ca.gov  
julie.martin@bp.com  
jwiedman@goodinmacbride.com  
jwmctarnaghan@duanemorris.com  
jxa2@pge.com  
karen.mcdonald@powerex.com  
karen@klindh.com  
karla.dailey@cityofpaloalto.org  
Kathryn.Wig@nrgenergy.com  
kbowen@winston.com  
kcolburn@symbioticstrategies.com  
kdusel@navigantconsulting.com  
keith.mccrea@sablauw.com  
kellie.smith@sen.ca.gov  
kelly.barr@srpnet.com  
ken.alex@doj.ca.gov  
ken.alex@doj.ca.gov  
kenneth.swain@navigantconsulting.com  
kerry.hattevik@mirant.com  
kevin.boudreaux@calpine.com  
kfox@wsgr.com  
kgrenfell@nrdc.org  
kgriffin@energy.state.ca.us  
kjsimonsen@ems-ca.com  
kkhoja@thelenreid.com  
klatt@energyattorney.com  
kmills@cbbf.com  
kunkiener@fox.net  
kowalewskia@calpine.com  
krd@cpuc.ca.gov  
kyle.l.davis@pacificorp.com  
kyle.silon@ecosecurities.com  
kyle\_boudreaux@fpl.com  
lars@resource-solutions.org  
Laura.Genao@sce.com  
lcottle@winston.com  
ldecarlo@energy.state.ca.us  
leilani.johnson@ladwp.com  
liddell@energyattorney.com  
lisa.c.schwartz@state.or.us  
lisa.decker@constellation.com  
lisa\_weinzimer@platts.com  
llorenz@semprautilities.com  
llund@commerceenergy.com  
lmh@eslawfirm.com

loe@cpuc.ca.gov  
Lorraine.Paskett@ladwp.com  
lpark@navigantconsulting.com  
lrdevanna-rf@cleanenergysystems.com  
lrm@cpuc.ca.gov  
lschavrien@semprautilities.com  
litt@cpuc.ca.gov  
marcel@turn.org  
marcie.milner@shell.com  
mary.lynn@constellation.com  
maureen@lennonassociates.com  
mclaughlin@braunlegal.com  
mdjoseph@adamsbroadwell.com  
meg@cpuc.ca.gov  
meridith.strand@swgas.com  
mflorio@turn.org  
mgarcia@arb.ca.gov  
mhyams@swater.org  
mjd@cpuc.ca.gov  
mmattes@nossaman.com  
mmazur@3phasesRenewables.com  
monica.schwebs@bingham.com  
mpa@a-klaw.com  
mprior@energy.state.ca.us  
mrw@mrwassoc.com  
mscheibl@arb.ca.gov  
mwaugh@arb.ca.gov  
nenbar@energy-insights.com  
ner@cpuc.ca.gov  
nes@a-klaw.com  
nlenssen@energy-insights.com  
norman.furuta@navy.mil  
notice@psrec.coop  
npedersen@hanmor.com  
nsuetake@turn.org  
nwhang@manatt.com  
obartho@smud.org  
obystrom@cera.com  
ofoote@hkcf-law.com  
pburmich@arb.ca.gov  
pduvair@energy.state.ca.us  
pepper@cleanpowermarkets.com  
phanschén@mofo.com  
Philip.H.Carver@state.or.us  
philm@scdenergy.com  
pjazayeri@stroock.com  
plusk@wecc.biz  
ppetillingill@caiso.com  
pseby@mckennalong.com  
psp@cpuc.ca.gov

pssed@adelphia.net  
pstoner@lgc.org  
pthompson@summitblue.com  
pvalien@thelen.com  
pw1@cpuc.ca.gov  
pzs@cpuc.ca.gov  
rachel@ceert.org  
ralph.dennis@constellation.com  
ram@cpuc.ca.gov  
randy.howard@ladwp.com  
randy.sable@swgas.com  
rapcowart@aol.com  
rhelgeson@scppa.org  
rhwisner@lbl.gov  
richards@mid.org  
rick\_noger@praxair.com  
rita@ritanortonconsulting.com  
rkeen@manatt.com  
rkmoore@gswater.com  
rmccann@umich.edu  
rmm@cpuc.ca.gov  
rmorillo@ci.burbank.ca.us  
robert.pettinato@ladwp.com  
roger.montgomery@swgas.com  
roger.pelote@williams.com  
rogerv@mid.org  
ron.deaton@ladwp.com  
rprince@semprautilities.com  
rreinhard@mofo.com  
rrtaylor@srpnet.com  
rsa@a-klaw.com  
rschmidt@bartlewells.com  
rsmutny-jones@caiso.com  
rwinthrop@pilotpowergroup.com  
ryan.flynn@pacificorp.com  
S1L7@pge.com  
saeed.farrokhpay@ferc.gov  
samuel.r.sadler@state.or.us  
Sandra.ely@state.nm.us  
sas@a-klaw.com  
sasteriadis@apx.com  
sbeatty@cwclaw.com  
sberlin@mccarthyllaw.com  
scarter@nrdc.org  
scohn@smud.org  
scott.tomashefsky@ncpa.com  
scottanders@sandiego.edu  
scr@cpuc.ca.gov  
sdhilton@stoel.com  
sellis@fypower.org

sendo@ci.pasadena.ca.us  
sephra.ninow@energycenter.org  
sgm@cpuc.ca.gov  
slins@ci.glendale.ca.us  
sls@a-klaw.com  
smichel@westernresources.org  
smindel@knowledgeinenergy.com  
smk@cpuc.ca.gov  
snewsom@semprautilities.com  
spauker@wsgr.com  
sscb@pge.com  
ssmyers@att.net  
steve.koerner@elpaso.com  
steve@schiller.com  
steven.huhman@morganstanley.com  
steven.schleimer@barclayscapital.com  
steven@iepa.com  
steven@moss.net  
svn@cpuc.ca.gov  
svongdeuane@semprasolutions.com  
svs6@pge.com  
tam@cpuc.ca.gov  
tburke@sfwater.org  
tcarlson@reliant.com  
tcx@cpuc.ca.gov  
tdarton@pilotpowergroup.com  
tdillard@sierrapacific.com  
THAMILTON5@CHARTER.NET  
thunt@cecmil.org  
tiffany.rau@bp.com  
tim.hemig@nrgenergy.com  
todil@mckennalong.com  
tomb@crossborderenergy.com  
trdill@westernhubs.com  
troberts@sempra.com  
vb@pointcarbon.com  
vitaly.lee@aes.com  
vjw3@pge.com  
vprabhakaran@goodinmacbride.com  
vwelch@environmentaldefense.org  
wbooth@booth-law.com  
westgas@aol.com  
william.tomlinson@elpaso.com  
wsm@cpuc.ca.gov  
wtasat@arb.ca.gov  
www@eslawfirm.com  
wynne@braunlegal.com  
ygross@sempraglobal.com  
zaiontj@bp.com